

United States District Court  
Southern District of Texas  
FILED

## UNITED STATES DISTRICT COURT

for the

Southern District of Texas

OCT 28 2014

United States of America

Clerk of Court v.

Jaime CISNEROS

YOB:1965

United States Citizen

Case No.

m-14-2081-m

Defendant(s)

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 19, 2014 in the county of Starr in the  
Southern District of Texas, the defendant(s) violated:

Code Section

21 USC 846

Offense Description

Subject did knowingly and willfully conspire with other persons for the purpose of distributing 434.2 kilograms / 957.2 pounds of marijuana a Schedule I controlled substance.

This criminal complaint is based on these facts:

See Attachment "A"

☒ Continued on the attached sheet.

approved by  
[Signature]

[Signature]

Complainant's signature

J. Brandon Wargo, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: 10/20/2014

[Signature]

Judge's signature

City and state: McAllen, Texas

Dorina Ramos, United States Magistrate Judge

Printed name and title

## ATTACHMENT A

Before the United States Magistrate Judge, Southern District of Texas, I, J. Brandon Wargo, Special Agent, U.S. Immigration and Customs Enforcement, being duly sworn, depose and say the following:

On March 19, 2014, HSI Falcon Dam Special Agents and Starr County HIDTA Task Force Investigators received information from a Source of Information (SOI) stating Jaime CISNEROS was stashing a large quantity of marijuana on a ranch in the community of Fronton, Texas. The SOI further provided directions to the area where the marijuana was stored. Due to the nature of the information received and the need for timely action, USBP Agents, assigned to the Rio Grande City, Texas Station where notified and immediately dispatched to the area.

After arriving at the location, HIDTA Investigator Posada spoke with USBP Agent Cantu, who stated he had been forwarded the information from the station and was able to observe fresh tire sign entering the property described the SOI. USBP Agents walking through the brush were able to observe, in plain view, bundles of marijuana, which were on the interior side of a brown rusted gate. HIDTA Investigators and USBP Agents secured the area, applied for and were granted a search and seizure warrant for the property. The warrant was executed and HIDTA Investigators and USBP Agents entered the property through the brown rusted gate and seized a total of 43 bundles of compressed marijuana, which had a weight of 434.2 kilograms.

During the course of the investigation, HSI Special Agents and HIDTA Task Force Officers overheard several telephone calls, from which CISNEROS was identified and provided instructions to individuals who were in the brush working with the marijuana. At approximately 1:11 PM, CISNEROS instructs the individuals in the brush to go to a gate located near his mother's residence (known as the CISNEROS Compound). A short time later, he tells the individuals in the brush that, "I'm going to send him through the same place near the trash (landfill located just north of the CISNEROS Compound), he's already going." The conversation continues, with CISNEROS talking about Border Patrol Agents in the area, and how, "the King Ranch is full of marijuana." At 5:17, CINEROS again calls the individuals in the brush and tells them, "Just go, I'm here watching... It's 43 pieces... Remember 43 pieces." Shortly thereafter, the individuals in the brush begin relaying to CISNEROS that there is a Border Patrol helicopter in the area and the group begins to think law enforcement is on to them. The group continues to work to camouflage the marijuana in the brush, telling CISNEROS, "Yes, it's covered JAIME; we covered it as much as we could." CISNEROS then advises them, "(HIDTA Investigator) Marroquin is parked outside of the gate." In one of the final calls the individuals in the brush contact CISNEROS and ask him, "JAIME

what happened?" CISNEROS then tells the other that HIDTA has gone into the ranch and found the marijuana.